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7 Attorneys for TURN, The Utility Reform Network

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 In re  
12 PG&E CORPORATION  
13  
14 and  
15 PACIFIC GAS AND ELECTRIC  
16 COMPANY,  
Debtors.

Case Nos. 19-30088 DM (Lead Case)  
19-30089 DM

Chapter 11  
*Jointly Administered*

17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
19 ☒ Affects both Debtors  
20 \* All papers shall be filed in the Lead Case  
21 No. 19-30088 DM.

Date: October 23, 2019  
Time: 10:00 a.m.  
Place: Courtroom 17  
450 Golden Gate Avenue  
San Francisco, California

**DKT NO. 3992**

22  
23 **JOINDER BY TURN IN OBJECTIONS AND OPPOSITIONS TO**  
24 **DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(B) AND 105(A) AND**  
25 **FED. R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE**  
26 **DEBTORS TO ENTER INTO RESTRUCTURING SUPPORT AGREEMENT WITH**  
27 **THE CONSENTING SUBROGATION CLAIMHOLDERS, (II) APPROVING THE TERMS**  
28 **OF SETTLEMENT WITH SUCH CONSENTING SUBROGATION CLAIMHOLDERS,**  
**INCLUDING THE ALLOWED SUBROGATION CLAIM AMOUNT,**  
**AND (III) GRANTING RELATED RELIEF**

1 The Utility Reform Network ("TURN") hereby joins in the following objections and  
2 oppositions to DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED.  
3 R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS  
4 TO ENTER INTO RESTRUCTURING SUPPORT AGREEMENT WITH THE CONSENTING  
5 SUBROGATION CLAIMHOLDERS, (II) APPROVING THE TERMS OF SETTLEMENT WITH  
6 SUCH CONSENTING SUBROGATION CLAIMHOLDERS, INCLUDING THE ALLOWED  
7 SUBROGATION CLAIM AMOUNT, AND (III) GRANTING RELATED RELIEF [DKT NO. 3992]:

- 8 1. [Dkt. #4232] OPPOSITION OF OFFICIAL COMMITTEE OF TORT CLAIMANTS TO  
9 DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R.  
10 BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE  
11 DEBTORS TO ENTER INTO RESTRUCTURING SUPPORT AGREEMENT WITH THE  
12 CONSENTING SUBROGATION CLAIMHOLDERS, (II) APPROVING THE TERMS OF  
SETTLEMENT WITH SUCH CONSENTING SUBROGATION CLAIMHOLDERS,  
INCLUDING THE ALLOWED SUBROGATION CLAIM AMOUNT, AND (III)  
GRANTING RELATED RELIEF [DKT NO. 3992]
- 13 2. [Dkt. #4236] OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED  
14 CREDITORS TO THE DEBTORS' SUBROGATION SETTLEMENT AND RSA  
15 MOTION.
- 16 3. [Dkt. #4237] OBJECTION OF THE UNITED STATES OF AMERICA TO DEBTORS'  
17 MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P.  
18 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO  
19 ENTER INTO RESTRUCTURING SUPPORT AGREEMENT WITH THE  
20 CONSENTING SUBROGATION CLAIMHOLDERS, (II) APPROVING THE TERMS OF  
21 SETTLEMENT WITH SUCH CONSENTING SUBROGATION CLAIMHOLDERS,  
22 INCLUDING THE ALLOWED SUBROGATION CLAIM AMOUNT, AND (III)  
23 GRANTING RELATED RELIEF
- 24 4. [Dkt. #4239] THE ADVENTIST CLAIMANTS' OBJECTION TO THE DEBTORS'  
25 MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P.  
26 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO  
27 ENTER INTO RESTRUCTURING SUPPORT AGREEMENT WITH THE  
28 CONSENTING SUBROGATION CLAIMHOLDERS, (II) APPROVING THE TERMS OF  
SETTLEMENT WITH SUCH CONSENTING SUBROGATION CLAIMHOLDERS,  
INCLUDING THE ALLOWED SUBROGATION CLAIM AMOUNT, AND (III)  
GRANTING RELATED RELIEF [DE # 3992]
5. [Dkt. #4241] OBJECTION OF THE AD HOC COMMITTEE OF SENIOR UNSECURED  
NOTEHOLDERS TO DEBTORS' MOTION TO ENTER INTO RESTRUCTURING  
SUPPORT AGREEMENT WITH THE CONSENTING SUBROGATION  
CLAIMHOLDERS.

1 Dated: October 22, 2019

BINDER & MALTER, LLP

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By: /s/ Robert G. Harris  
Robert G. Harris

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Attorneys for TURN, the Utility Reform Network

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